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MEMO ENDORSED

September 29, 2021

Honorable Colleen McMahon
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

9/29/21
Assignment of Associate
Counsel Granted.

Re: U.S. v. Gary Laforest,
21 Cr. 272(CM)

Colleen McMahon

Dear Judge McMahon:

I represent Gary Laforest in the above captioned case pursuant to the Criminal Justice Act. I write to respectfully request that Your Honor authorize the assignment of my associate, William Rempel, to assist me in this case. Discovery is massive. It includes over 20,000 pages of documents pertaining to bank and credit cards accounts, approximately 1000 pages of law enforcement, recordings, search warrant applications and affidavits in addition to other significant discovery. To effectively review all the discovery, the use of an associate attorney will be necessary. Mr. Rempel will also assist in meeting with the client to review the extensive discovery, as well as assist with legal research and drafting of potential pre-trial motions.

Subject to the Court's approval I believe at least 100 hours at \$90 per hour would be appropriate. If additional hours are needed. I will apply to the Court for the assignment of those hours.

Thank you for your consideration of this request.

Respectfully yours,

/s/

Thomas F. X. Dunn

